

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

ROMELLO DAMAINE JOHNSON

Case No.

2:21-mj-30401

Judge: Unassigned,

Filed: 08-19-2021

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 17, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(3)

Unlawful User of a Controlled Substance in Possession of a Firearms

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.*Complainant's signature*

Special Agent, Brett Brandon, ATF

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: August 19, 2021City and state: Detroit, Michigan*Judge's signature*

Hon. Patricia T. Morris, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AFFIDAVIT IN SUPPORT OF
AN CRIMINAL COMPLAINT

I, Brett J. Brandon, being first duly sworn, hereby state:

1. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), United States Department of Justice, assigned to the Detroit Field Division since July 2013. I graduated from the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment with ATF, I have conducted and/or participated in numerous criminal investigations involving the illegal possession, use, and sale of firearms, drug trafficking violations, and criminal street gangs.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. ATF is currently conducting a criminal investigation concerning ROMELLO DAMAINE JOHNSON (B/M; DOB: XX/XX/2002) for violations of

18 U.S.C. § 922(g)(3) – Unlawful User of a Controlled Substance in Possession of a Firearm, among other state and federal criminal violations.

PROBABLE CAUSE

4. On August 17, 2021, officers with the Detroit Police Department served a state search warrant at 19560 Fairport Street in Detroit, Michigan. While on scene, one of the officers was standing next to a silver 2007 Mercury Mariner bearing Ohio license plate “JLL7681”, parked across the street in front of 19577 Fairport Street. The officer observed JOHNSON exit the backseat of the vehicle and begin walking through a front yard of a nearby residence. The officer looked in the backseat of the vehicle, which was illuminated by several marked units with their overhead lights active and observed a magazine and grip of a firearm sticking out of a brown paper bag in the accessible trunk next to where JOHNSON was seated inside of the vehicle prior to exiting. The officer utilized a flashlight from the outside of the vehicle to illuminate the area and was able to confirm the presence of the firearm. The officer was also aware JOHNSON was nineteen years old based on prior contacts and therefore ineligible to obtain a concealed pistol license (CPL). Officers arrested JOHNSON for carrying a concealed weapon (CCW) and recovered one Glock 19 9mm pistol bearing serial number “ADAD877” with one round in the chamber and several rounds in the extended magazine inserted into the firearm from the brown paper bag located inside the

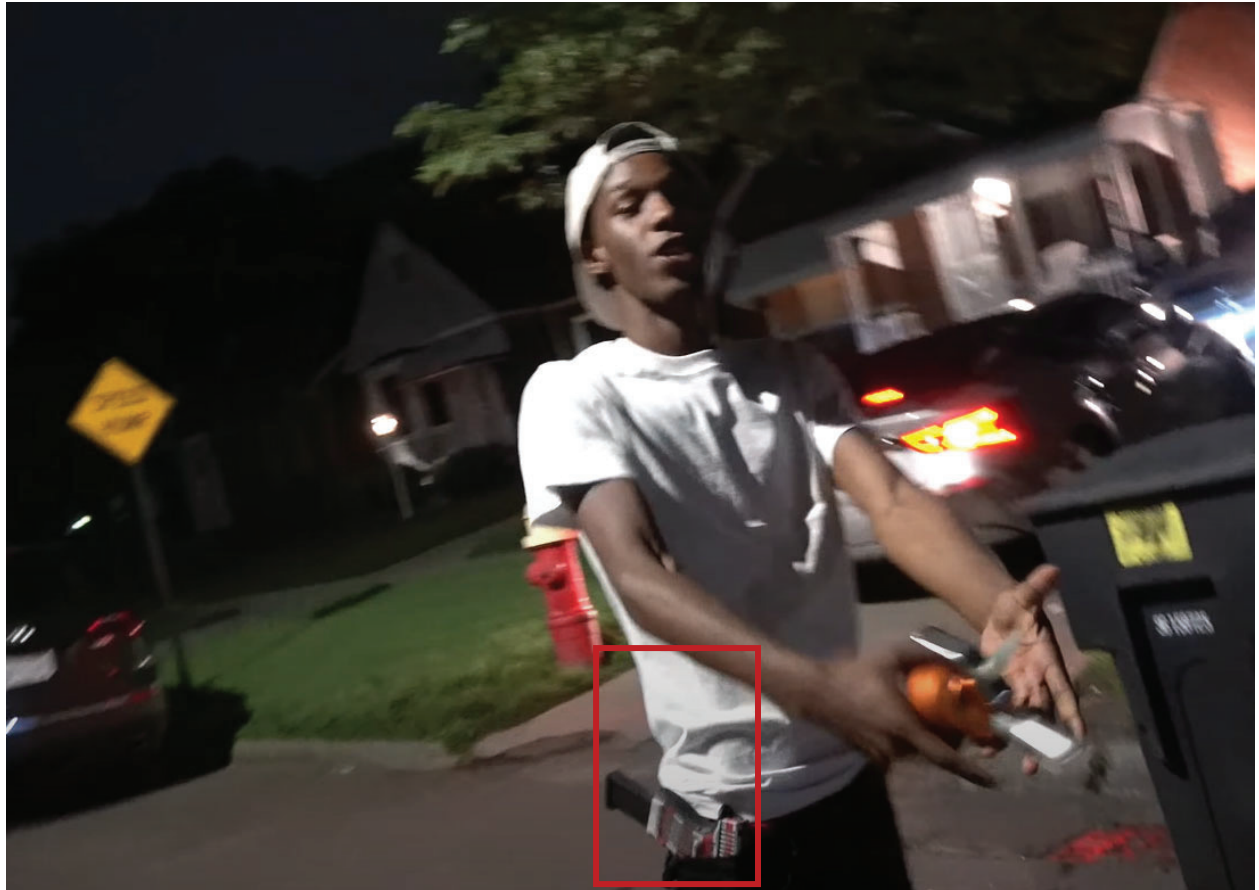
accessible trunk of the vehicle. The officers noted the firearm had been painted with an American flag design. See below image of the firearm and magazine the officers provided to affiant. Affiant noted the uniqueness of the firearm due to the custom aftermarket paint design.

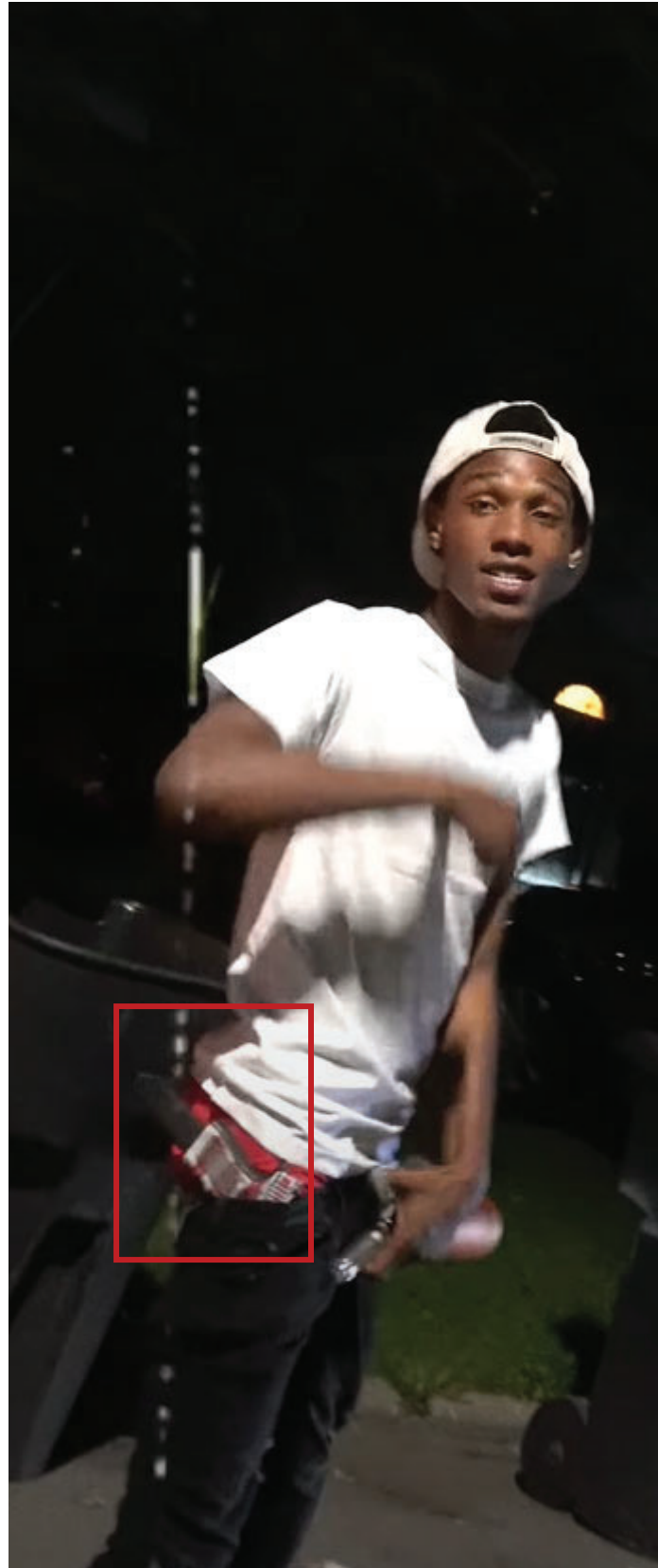


5. Affiant queried the Michigan State Network of Agency Photos (SNAP) and obtained the below booking photograph of JOHNSON taken at the Detroit Detention Center following his arrest on August 17, 2021. Affiant noted the distinctive tattoo under JOHNSON's left eye.



6. On August 18, 2021, affiant reviewed a publicly available YouTube video entitled “Lil Mello – Baxk to Pressin (shotby@Will_Visuals)” dated July 25, 2021. The video is located at <https://youtu.be/WTdNRACqn6k>. In the video, JOHNSON, with the tattoo clearly visible under his left eye, whom affiant identified by reviewing the above booking photograph, is depicted rapping in various locations. At several points during the video, affiant observed JOHNSON with what appears to be the Glock pistol with the aftermarket American flag paint design concealed in his waistband. See below screen captures taken by affiant.





7. On August 18, 2021, affiant and Special Agent Weston conducted an audio-recorded post-Miranda interview of JOHNSON at the Detroit Detention Center. JOHNSON admitted to smoking marijuana every day since he was fourteen years old. JOHNSON stated he smoked so much marijuana he could not specify an amount.

8. JOHNSON admitted to possessing the subject firearm on previous occasions for music videos within the city of Detroit, identifying the above music video as being shot on Fairport Street (the location of his arrest). JOHNSON stated he has free and ready access to the subject firearm anytime he wants to possess it. JOHNSON denied owning the firearm.

9. JOHNSON stated he is also currently charged in a criminal case in Las Vegas, Nevada and reports weekly to the court. Affiant reviewed Las Vegas Justice Court Register of Actions for Case No. 21-CR-008438-001, which revealed JOHNSON is currently charged with Robbery – with the use of deadly weapon of tear gas, Conspiracy to commit robbery, and Buy, possess, receive or withhold stolen property, value \$25,000 but less than \$100,000. Affiant also reviewed Las Vegas Police Metropolitan Police Department Declaration of Arrest Report No. LLV210200082640, which documented the underlying facts of the case. On December 31, 2021, JOHNSON and another individual robbed a marijuana dealer at gunpoint after JOHNSON ordered one-half ounce of marijuana from the victim.

JOHNSON is alleged to have stolen a firearm from the victim's vehicle during the robbery. The victim identified JOHNSON via photo array and identified JOHNSON's Instagram account as Instagram User ID "lilmello700". During the post-Miranda interview that was conducted on August 18, 2021, JOHNSON identified his Instagram account user ID as "lilmello700."

10. On August 18, 2021, JOHNSON granted the agents consent to search his red Apple iPhone, which was in his personal property at the Detroit Detention Center. Affiant utilized a passcode provided by JOHNSON and conducted an initial physical review of the device. Affiant observed several images of JOHNSON with the subject firearm, dating back to the first week of July 2021.

11. Specifically, on July 8, 2021 at approximately 3:52 pm, the device recorded two videos of JOHNSON holding an infant child with the subject firearm partially concealed in his waistband. See below screen capture taken from the video.



12. On August 18, 2021, affiant contacted ATF Interstate Nexus Expert, Special Agent Michael Jacobs and provided a verbal description of the firearm. Based upon the verbal description, Special Agent Jacobs advised the firearm is a firearm as defined under 18 U.S.C. § 921 and manufactured outside of the state of Michigan after 1898, and therefore had traveled in and affected interstate commerce.

CONCLUSION

13. Based upon the aforementioned facts stated herein, there is probable cause to believe ROMELLO DAMAINE JOHNSON, a user of a controlled substance, namely marijuana, did knowingly and intentionally possess one Glock 19 9mm pistol bearing serial number “ADAD877”, a firearm having affected interstate commerce, in violation of 18 U.S.C. § 922(g)(3) – Unlawful User of a Controlled Substance in Possession of a Firearm. Said violation occurring on August 17, 2021, in the city of Detroit, in the County of Wayne, in the Eastern Judicial District of Michigan.

Respectfully submitted,



Brett J. Brandon
ATF Special Agent

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Patricia T. Morris
United States Magistrate Judge

Dated: August 19, 2021